

## REMARKS

Claims 1-3 and 5-29 are pending prior to entering this amendment. Claims 1-2 and 17-27 were previously withdrawn. Applicant respectfully traverses the rejections for the reasons explained below, and requests reconsideration. In this amendment, claim 13 is amended, and claims 14-15 are canceled. No claims are added. In addition, withdrawn claims 1-2 and 17-27 are now canceled to place the case in condition for allowance. The pending claims after this amendment are claims 3, 5-13, 16 and 28-29.

Claims 3, 5-12, 16 and 28-29 were indicated as allowed in the Official action.<sup>1</sup>

### Alleged Substantive Rejections

1. The examiner rejected claims 13-15 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Claim 13 is currently amended so as to obviate this ground for rejection. Claims 14-15 are canceled.
2. Claims 13 and 15 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Machin in view of Raphaeli. Claim 13 is currently amended to recite the following:

“13. (Currently amended) A method of establishing a multicast connection in a centralized wired ~~communication system~~ network, the method comprising:

providing a centralized wired network characterized by having a single, common physical wired connection interconnecting all devices attached to the network, so that all communications among the attached network devices travel directly over the wired connection;

providing a local bandwidth manager in each device attached to the centralized network;  
creating multiple point-to-point connections between a source device and at least two destination devices;

in a source device attached to the network, receiving a request in the local bandwidth manager for a multicast transmission;

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<sup>1</sup> In the *Office Action Summary*, claim 10 was omitted from the list of allowed claims at line 5. However, claim 10 depends from allowed claim 5, so applicant infers that claim 10 was intended to be allowed.

in the local bandwidth manager, requesting a bearer channel from the central coordinator to a first destination device;

in the local bandwidth manager, receiving confirmation of the requested bearer channel from the central coordinator;

repeating said requesting a bearer channel and receiving confirmation of the requested bearer channel for each additional destination device in accordance with the request for a multicast transmission;

replicating application data such that a replica exists for each destination device; and transmitting the replicas on the point-to-point connections on the confirmed bearer channels assigned by the central coordinator;

wherein each connection is associated with a corresponding service access point of a transport layer of the source device;

each connection is associated with a corresponding transport layer port of the transport layer of the source device; and

each connection is assigned a connection identifier that is globally unique throughout the centralized network for use in routing data packets from the source device to selected ports in the destination devices.”

Machin is inapposite. It does not disclose the centralized wired network operations of the present claim. Rather, Machin describes an I/O subsystem for use within a single device on a network. And the network is not centrally managed. It appears to be an ordinary packet network such as Ethernet. Machin’s I/O subsystem comprises device drivers for controlling connection-oriented hardware adapters, connection-oriented data transports, and an integrating component allowing data transport drivers and hardware device drivers to be "bound" together to form data communication channels.<sup>2</sup> Further, a component is disclosed that interacts with a known application-level interface, such as TAPI, and converts such known application-level interface commands into appropriate commands for the connection interface of the integrating component. All this allows the application programmer to take advantage of a connection-oriented I/O

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<sup>2</sup> See Machin, FIG. 2.

subsystem and underlying connection-oriented devices without requiring the programmer to learn yet another interface.<sup>3</sup>

The examiner pointed out FIG. 19B with regard to a multicast connection, and the text at [0158] with regard to a point-to-point connection. However, FIG. 19B shows a PPP interface at the user mode (application) to kernel interface, all within one device. Again, Machin is concerned with the application layer interface, rather than management of multicast connections over, “a centralized wired network characterized by having a single, common physical wired connection interconnecting all devices attached to the network, so that all communications among the attached network devices travel directly over the wired connection” as per applicant’s claim 13.

The PPP protocol admittedly is well known for simple links to transport packets between two peers. Nonetheless, the reference does not suggest the *centralized management* described in applicant’s claim, because Machin is not directed to devices on a centralized network. More specifically, the reference does not disclose at least the claim steps of:

“in the local bandwidth manager, requesting a bearer channel from the central coordinator to a first destination device;

in the local bandwidth manager, receiving confirmation of the requested bearer channel from the central coordinator;

repeating said requesting a bearer channel and receiving confirmation of the requested bearer channel for each additional destination device in accordance with the request for a multicast transmission.”

For at least these reasons, claim 13 is believed to be allowable over the cited art.

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<sup>3</sup> Machin, Abstract.

### **Conclusion**

For the foregoing reasons, reconsideration and allowance of claim 13 of the application as amended is requested. The remaining claims have already been allowed. This should place the case in condition for allowance. The examiner is encouraged to telephone the undersigned at (503) 224-2170 if any issues remain.

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Respectfully submitted,

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